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Counsel for Det Norkse Veritas (USA), Inc.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

GENERAL MOTORS CORP., et al.,

Debtors.

Case No. 09-50026 (REG)

LIMITED OBJECTION TO PROPOSED CURE AMOUNT UNDER NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY, AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS RELATED THERETO

Det Norske Veritas (USA), Inc. ("DNV") files this Limited Objection to the Proposed Cure Amount under the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the "Notice").

## **Limited Objection**

1. DNV is a party to various unexpired leases and contracts with the Debtors.

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2. The Notice references schedules which have a proposed cure amount of

\$22,246.61 with respect to DNV. It is unclear from the notice and schedules as to which of the

leases and contracts the Debtors propose to assume and assign to the purchaser.

3. DNV objects to the proposed cure amount. The books and records of DNV

reflect outstanding balances of approximately \$312,786.22 as of the Debtors' Petition Date.

Attached as Exhibit A are true and correct copies of the outstanding matters between the

Debtors and DNV which evidence the cure amounts for any assumption and assignment.

WHEREFORE, DNV respectfully requests entry of an order establishing the cure amount

in connection with the assumption and assignment of any contracts and leases as \$312,786.22 as

provided under the respective executory contracts by and between DNV and the Debtors and for

such other further relief as is just.

**DATED:** June 11, 2009.

Respectfully submitted,

WINSTEAD PC

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/s/ R. Michael Farguhar

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Joseph G. Epstein

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S.D. Tex. No. 11733

ATTORNEYS FOR DET NORSKE VERITAS (USA), INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2009, a true and correct copy of the foregoing objection was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in these cases pursuant to the Electronic Filing Procedures in this District, and that the parties listed below have been served with a copy of the objection by federal express delivery service, properly addressed to each of such parties.

/s/ Joseph G. Epstein

One of Counsel

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Attn: Warren Command Center, Mail Code 480-206-114

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